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U.S. DISTRICT COURT
MID. DIST. TENN.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

Hartsville DIVISION

Andre L. Mayfield
(Name)

128982
(Prison Id. No.)

(Name)

(Prison Id. No.)

Plaintiff(s)

v.

Cpt. Maxwell, Sgt. Plunk
(Name)

% John Doe, Nurse Jane Doe,
(Name) % Williamson

Defendant(s)

(List the names of all the plaintiffs filing
this lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

Civil Action No. _____
(To be assigned by the Clerk's Office.
Do not write in this space.)

JURY TRIAL REQUESTED ☒ YES ☐ NO

(List the names of all defendants
against whom you are filing this
lawsuit. Do you use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS FILED
PURSUANT TO 42 U.S.C. § 1983

I. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Andre L. Mayfield
Prison I.D. No. of the first plaintiff: 128982
Address of the first plaintiff: TICC - 140 Macore Way
Hartsville Tenn 37074

Status of Plaintiff: CONVICTED (☒) PRETRIAL DETAINEE (☐)

2. Name of the second plaintiff: _____
Prison I.D. No. of the second plaintiff: _____
Address of the second plaintiff: _____

Status of Plaintiff: CONVICTED (☐) PRETRIAL DETAINEE (☐)

(Include the name of the institution and mailing address with zip code for each plaintiff. If any plaintiff changes his or her address, he or she must notify the Court immediately. If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.)

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Cpt. MAXWELL
 Place of employment of the first defendant: THOUSDALE TURNER
CORRECTIONS CENTER
 First defendant's address: 140 MACONE WAY
HARTSVILLE TNO. 37074

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

PERSONAL Capacity also.

2. Name of the second defendant: Sgt. PLUNK
 Place of employment of the second defendant: THOUSDALE TURNER
CORRECTIONS CENTER
 Second defendant's address: 140 MACONE WAY
HARTSVILLE TNO. 37074

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

PERSONAL Capacity Also.

(If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, his or her place of employment, address, and the capacity in which you are suing that defendant. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide each defendant's proper name, place of employment, and address, the Clerk will be unable to serve that defendant should process issue.)

II. JURISDICTION

- A. Jurisdiction is asserted pursuant to 42 U.S.C. § 1983 (applies to state prisoners).
 Jurisdiction is also invoked pursuant to 28 U.S.C. § 1343(a)(3).

If you wish to assert jurisdiction under different or additional statutes, you may list them below:

III. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuit(s) in the United States District Court for the Middle District of Tennessee, or in any other federal or state court? ☒ Yes ☐ No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit: Andre Mayfield-Plaintiff

Plaintiffs Do not have the Information Available
lost Prior Civil Suit Papers during Tharsten
 Defendants A Few Years Ago but I was the Plaintiff

2. In what court did you file the previous lawsuit? Middle, And Eastern
District the best I Remember
 (If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? Do not know

4. What was the Judge's name to whom the case was assigned? Do not
Remember

5. What type of case was it (for example, habeas corpus or civil rights action)?
Civil Suit And habeas Corpus

6. When did you file the previous lawsuit? (Provide the year, if you do not know the exact date.) Unknown

7. What was the result of the previous lawsuit? For example, was the case dismissed or appealed, or is it still pending? Dismissed

8. When was the previous lawsuit decided by the court? (Provide the year, if you do not know the exact date.) Do not Remember it was Several
different dates And Years.

9. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit? ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

IV. EXHAUSTION

A. Are the facts of your lawsuit related to your present confinement?

☒ Yes ☐ No

B. If you checked the box marked "No" in question III.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. Thamesdale

TURNER CONNECTION CENTER - 140 MACON WAY
HARTSVILLE TN. 37074

C. Do the facts of your lawsuit relate to your confinement in a Tennessee state prison?

☒ Yes ☐ No

(If you checked the box marked "No," proceed to question IV.G. If you checked the box marked "Yes," proceed to question IV.D.)

D. Have you presented these facts to the prison authorities through the state grievance procedure? ☒ Yes ☐ No

E. If you checked the box marked "Yes" in question III.D above:

1. What steps did you take? I filed the Grievance on 10-24-16
And placed it in the inmate mailbox in the AC Pod because
there is no grievance box in the AC Pod on A-Unit so inmate put
them in mailbox
2. What was the response of prison authorities? Haven't heard any
response on it at all.

F. If you checked the box marked "No" in question IV.D above, explain why not. _____

G. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)? ☐ Yes ☐ No

H. If "Yes" to the question above, have you presented these facts to the authorities who operate the detention facility? ☐ Yes ☐ No

I. If you checked the box marked "Yes" in question III.H above:

1. What steps did you take? _____

2. What was the response of the authorities who run the detention facility? _____

J. If you checked the box marked "No" in question IV.H above, explain why not. _____

V. CAUSE OF ACTION

Briefly explain which of your constitutional rights were violated:

8th Amendment - Cruel Unusual Punishment, Denial Medical
 14th Amendment - Denial Protection, Denial Due Process, Deliberate Indifference
 15th Amendment - Denial Adequate Educational Access

VI. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 ½ inch x 11 inch paper. Write on one side only, and leave a 1-inch margin on all 4 sides.

On 6-12-16 I was placed in Segregation Pending Protective Custody due to Crips, Vice Lords, And GD Gang Members trying to kill me. While in Segregation I have been refused to be provided A "Protective Custody Hearing" with myself being present to provide proof and additional information of why I need protective custody status as provided and mandated by TDOC Policy 404.09, which is defendant Williamsore job to ensure. However defendant Williamsore has refused A TDOC Policy 404.09 as mandated and has without cause or reason labeled me as RCA meaning "Refuse Cell Assignment" without me ever refusing A Cell Assignment or receiving A disciplinary report for RCA. And placed me in RCA Pod AE where they transfer from the main compound come to by just refusing to go to his Assign Cell. On 10-24-16 while

VII. RELIEF REQUESTED: State exactly what you want the Court to order each defendant to do for you.

- ① Enter declaratory Order Declaring each defendant + Violated Plaintiff's Rights.
- ② Order each defendant to Nominal Damages of \$100.00
- ③ Order each defendant to Pay Punitive Damages of \$10,000.00
- ④ Order each defendant to Pay Compensatory Damages of \$10,000.00
- ⑤ Order that each defendant acted Under Color of Law in Violation of Oath of office also.

I request a jury trial.

☒ Yes

☐ No

VIII. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Andre L. Mayfield Date: 10/29/16
 Prison Id. No. 128982
 Address (Include the city, state and zip code.): ITCC 140 Macon Way
Huntsville TN. 37074

Signature: _____ Date: _____
 Prison Id. No. _____
 Address (Include the city, state and zip code.): _____

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information requested above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT AND (1) THE REQUIRED FILING FEE OR (2) COMPLETED APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES AND COSTS TOGETHER. Complaints received without the required filing fee or application to proceed without prepayment of fees will be returned. Filing fees and applications to proceed without prepayment of fees submitted without a complaint will be returned.

Continuance On Defendants

3. Corrections officer John Doe, at Trousdale Turner Corrections Center, located at 140 Macon Way, Hartsville TN. 37074. He was the Block 10 working in the Clinic on 10/23/16 at Approx. 1:00AM - 2:00AM

He is sued in his Individual, official And Personal Capacities.

4. Corrections Nurse Jane Doe, at Trousdale Turner Corrections Center, located at 140 Macon Way - Hartsville TN. 37074. She was the Nurse working on 10/23/16 at Approx. 1:00AM - 2:00AM she is being Sued in her Individual, official, And Personal Capacities.

5. Corrections officer Williamson (Classification Dept) , at Trousdale Turner Corrections Center - 140 Macon Way - Hartsville TN. 37074. She is being sued in her Individual, official, And Personal Capacities.

Continued Statement of Facts

Continued housed in AE 206 RCA Pod, I discovered after being informed that the inmate in AE cell 212 whom they call Flot Stone and is a Gang Member of one of the Gangs trying to kill me, had been able to ~~get~~ obtain a bed and cell in AE Pod with me in an attempt to try and kill me. After discovering this on 10/20/16 I started trying to tell officials that someone was in this pod to try and kill me, and that also other inmates are out to try and get the keys from the guard in the AD Pod next door to try and come to this pod and get me. The officials would not listen so I started to get stress and nervous and my stomach started hurting real bad and I had to be taken to the hospital on 10-22-16 at approx. 1:30pm. In Lebarooko the... I was returned to Institution on 10/22/16 at approx. 7:30pm or 8:00pm. At which time I was held in the Institutional Clinic until around 12:00AM - 1:00AM, while in the clinic I once again tried to speak with TCC official whom this time was Sgt. Plunk AKA detenednot Plunk, and explain to him that there was an inmate in AE 212 that's in AE Pod to get me and try to kill me and that he is a gang member of the Crips who has a KOS out on me, which MEAN kill or else. I am informed that det

Plunk that I was Also Informed that Several Gang Members In AP Pod was said to supposedly try to get the Keys from the officer to try And get to AE Pod And Get AE Keys to get to ME. Defendant Plunk stated he would talk to the Lieutenant about it, And shortly thereafter I was Return to My Pod AE from the clinic. Once back In back In My cell I Ask the Co Ms. Watson to call Sgt. Plunk to the Pod, because there was 2 Gang Members In the Pod from AA Pod the Main Compound Pod that was In AE Pod Waxing the floor, where there was not suppose to be Main Compound inmates working In AE Pod. Defendant Plunk Arrived at AE Pod shortly thereafter (time unknown) I Explained to Defendant Plunk that the 2 Inmates Waxing the floor was Gang Members of the Crips And was Not Suppose to be working In AE Pod, Defendant Plunk Ignored Me And Go by downe And left My door And went talking to the Co Watson Again, that's where I followed out the cell door to Defendant Plunk that I was about to take A handful of pills (which was Approx. 30 Benadryl Pills), Defendant Plunk Came to My Cell door And showed him the Pills And he Said OK And I took all the pills In his presence he walked off My door, And he left the Pod

then defendant Sgt. Plunk returned to Unit
Pod A and escorted me to Clinic on 10/23/16
at approx. times between 1:00AM - 2:30AM.

Upon arrival at Clinic defendant Maxwell,
and defendant John Doe was standing at
Nurse front desk. As I was escorted in
by defendant Plunk. Once inside Clinic I
was seated in chair at the Nurse front desk
where defendant Maxwell, John Doe, and now
defendant Plunk was standing over me at. Defend-
ant Maxwell ask what was going on and I told
him I took about 30 Benadryl Pills and he
said No you didn't, I told him I took them
in front of defendant Plunk, defendant
Maxwell said well why you do that, I explain
the threat on my life as I had to all other
officials, that's where defendant Jane Doe the
Nurse ask me my Prison ID Number and went
in Medical Record Room to get my file. Defend-
ant Plunk followed the Nurse in the Record
Room, while defendant Jane Doe and Plunk
was in Record Room, the Pills started to
cause me to be drowsy and I told defendant
Maxwell that I need Medical help and he
said You not getting it you want to die
we going to let you die, and ask is there
anyone I want him to call and let them
know that I was dead when I died and

I told defendant Maxwell My Grandmother And he Ask for her phone Number, I Felt Even More Anxious And told defendant Maxwell Please don't let Me die get Me help, defendant Maxwell Said that I will Not Rape Another CCA Employee Family, And that he Know the Gang Members want to Kill Me for the same thing is because I Raped one of they family Members, And he didn't care if they Killed Me! The Next thing I Remember was defendant John Doe (the so working Medical A black Man) continuously picking Me up And taking Me outside In the cold Air every time I fell Asleep, then set Me back In the chair which the Clinic Camera will show, No Medical Assistance was provided to Me. I then Remember being walked back to My cell by someone, who told Me I was lucky And that they guess the Gang Members will Kill Me since I didn't ^{die} today! So Defendant John Doe said I will be dead soon!

I Am In Prison for Rape one allegedly 3 women. One Name Chris Bumpus who is kind to several CCA Employees at South Central Correctional Facility In Clinton Tn. where Chris Bumpus was born And raised. Also allege Victim Barbara Huey is kind to ~~several~~ Gang Member called Phoebe who is ~~in~~ at the Institution

As I have Repeatedly Informed the Staff.

On 10/24/16 I learned from Mental Health Medical Staff who came to AE to speak with Me, that defendant Jane Doe, Maxwell, And Sgt. Plunk had Falsified Medical Records to Falsely state that I was taken to hospital for 30 Bexoneryl Pill overdose on 10/23/16 where I was never taken to hospital on 10/23/16 for Bexoneryl overdose. I was taken to hospital on 10/22/16 for My stomach and Nothing More As stated The Complaint.

While housed In AE I have had No Low Library Access but once since 6-12-16 until 10/29/16 And that was In the form of talking A legal Transcribe helper who came to My cell door And Ask if I needed Anything. That was bout 2 Months Ago. Noone Since. No Copy Access, No Notary Access, No legal Envelope And Paper Etc. Access, No lawbooks or Computer Access, No legal helper Access.

My life Is Severely Threatened At this Prison I have locked Myself In My cell And will Not Rec with cell 212, And fear of Centin guards Since Defendants Actions on 10/23/16.

151 Andrew Mayfield
10/29/16